

APPENDIX 8.12B

**Phase I Environmental Site Assessment for the
Proposed Ripon Power Plant, Ripon, California**

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Five copies of Appendix 8.12B, Phase I Environmental Site Assessment for the Proposed Ripon Power Plant, Ripon, California, were submitted to the California Energy Commission.

PHASE I ENVIRONMENTAL SITE ASSESSMENT

**MID Proposed Doak Site: APN 259-330-14
South Stockton Avenue and Doak Boulevard
Ripon, California 95366**

December 3, 2002

Prepared for:

Modesto Irrigation District
929 Woodland Avenue
Modesto, California 95351

Prepared by:

The Denali Group
2255 Morello Avenue, Suite 170
Pleasant Hill, California 94523

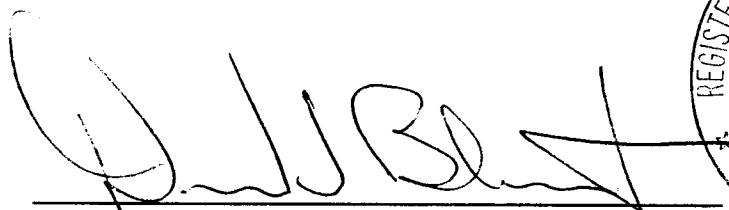
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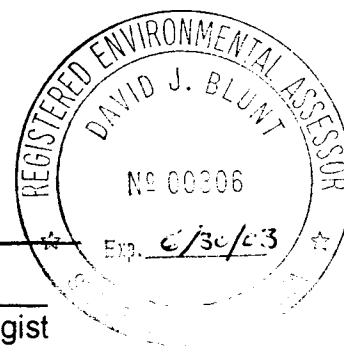
DATE: December 3, 2002

PROJECT NO: 4205a

SUBMITTED BY: **The Denali Group**
2255 Morello Avenue, Suite 170
Pleasant Hill, California 94523

PREPARED BY:


David J. Blunt, Principal Environmental Geologist
Registered Environmental Assessor No. 0306
Registered Geologist No. 4516



REVIEWED BY:

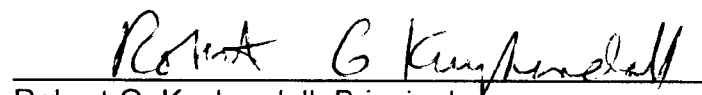

Robert G. Kuykendall, Principal
Registered Environmental Assessor No. 0366
Certified Hazardous Material Manager No. 7948

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PHASE I ENVIRONMENTAL SITE ASSESSMENT

**MID Proposed Doak Site: APN 259-330-14
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1.0 INTRODUCTION

1.1 Purpose

The Denali Group (Denali) has prepared this Phase I Environmental Site Assessment for Modesto Irrigation District (MID), who we understand is interested in purchasing the parcel of land for sale (Site) in the vicinity of South Stockton Avenue and Doak Boulevard, in the City of Ripon, California. The Site location is shown on Figure 1 – Location Map.

The purpose of this study is to document environmental concerns at the Site, to document the current and historic chemical use, and to evaluate the potential for a release of hazardous materials from on- or off-site sources that could significantly impact the Site's soil and/or ground water quality.

1.2 Scope of Work

As requested in MID RFQ 13730, the scope of work for this study is performed in general accordance with the American Society for Testing and Materials (ASTM) Designation E 1527-97. The scope of work included the following tasks.

- Research chain-of-title for recorded deed information to identify owners who may have used the property for industrial, hazardous waste or material handling activities;
- Search governmental databases in accordance with the American Standard for Testing and Materials (ASTM) standards to identify and map properties located within one-half mile of the Site that have potential or existing environmental liabilities;
- Review of aerial photographs of the Site and neighboring properties to determine current and historic uses that may have or have had an environmental impact on the Site;

- Interview the current owner and/or Site representative to identify any additional areas of concern;
- Conduct visual inspection of the Site and neighboring properties to identify potential concerns from onsite and offsite property uses and for evidence of spills or other factors of environmental concern;
- If deemed necessary, develop a plan of shallow soil sampling to establish the likelihood of soil contamination that may impact the District's possible future use of the property;
- Evaluate environmental conditions of the site and develop conclusions regarding the Site's suitability for the Project, based on those conditions, and prepare this ESA report for the District, detailing the findings, conclusions and recommendations for further environmental investigation.

The limitations of this Phase I environmental site assessment are presented in Section 7.

2.0 TITLE SEARCH

2.1 Site Location and Ownership

Chicago Title Insurance Company, Stockton California, performed a search of grant deeds of the land (see Appendix A). Based on available information, the Site was identified as Assessor's Parcel Number APN 259-330-14. Eight grant deeds and two corporation grant deeds are listed. Lombardy Holding Inc., a California corporation is the most recent holder of title. Lombardy Holding Inc. took title of the property from Wood Corporation on July 7, 1997. Wood Corporation took title from Frank and Vetra Denis on March 8, 1995. In the twenty years prior to Wood Corporation there were three different grantors with grantees as joint tenants.

A corporation grant deed from Wood Corporation to the City of Ripon is recorded on April 4, 1995. After Lombardy Holdings Inc. purchased the property in 1997, a corporation grant deed is recorded to the City of Ripon in May 8, 2001. Lombardy Holding Inc. is recorded granting the deed to Lombardy Holding Inc. on January 8, 2002 and again on October 3, 2002 to become the current owner of record.

3.0 REGULATORY DATABASE REVIEW

Denali personnel obtained a regulatory agency database search from Environmental Data Resources, Inc. (see EDR Database in Appendix B). This report is a list of facilities or properties located within 1/8th to 1-mile radius of the Site. The facilities or properties are listed on federal, state, and local regulatory agency databases as hazardous waste generators, treatment, storage, or disposal facilities, known or suspected contamination sites, underground fuel storage tanks sites, or those with reported environmental releases. The regulatory database search also includes physiological properties recorded in the vicinity of the Site.

3.1 Historical Maps

Denali reviewed historical maps of the Site and adjacent properties. Historical maps were identified for the area of the Site. Historical topographic maps and aerial photographs are presented in Appendix C. As a general rule, the absence of historical maps for a given area tends to support evidence that the area was not significantly developed.

Topographic Map

Denali reviewed Site information observed information on topographic maps provided by The EDR-Historical Topographic Map Report:

Modesto West 15' Topographic Quadrangle, 1941

Scale 1:62,500

City of Ripon streets are identified on the map. The symbol for an orchard is marked in the Site area. The terminus of S. Stockton Avenue and Locust Street are clearly identified along with an irrigation lateral that runs adjacent to the Site.

Salida 7.5' Topographic Quadrangle, 1915

Scale 1:24,000

A few unnamed streets are indicated. No indications of crop usage are shown on the Site area.

Salida 7.5' Topographic Quadrangle, 1953

Scale 1:24,000

The symbol for an orchard is marked in the Site area. The City of Ripon sewage disposal ponds are marked just south of the orchard.

Salida 7.5' Topographic Quadrangle, 1969**Scale 1:24,000**

The orchard is identified up to the south end of S. Stockton Avenue. The sewage disposal ponds at the south end of the Site orchard are indicated as narrow oriented east to west. Simpson Paper/Fox River Mill has been constructed along with industrial waste ponds.

Salida 7.5' Topographic Quadrangle, 1969 revised 1976 Scale 1:24,000

Photo-revised changes to the map include a building immediately north of the Site. Additional industrial waste ponds have been constructed at the Simpson Paper/Fox River Mill. Several large buildings have been constructed to the northeast of the Site.

Salida 7.5' Topographic Quadrangle, 1969 revised 1987 Scale 1:24,000

Little change to the Site area. New residential development is shown 1-mile east of Hwy 99.

Further review of the Site topography on the Salida 7.5 Minute Topographic Quadrangle, published 1969 by the U.S. Geologic Survey (USGS) and photorevised 1987 indicated the following:

- The Site has an average elevation of approximately 66 feet above mean sea level (MSL).
- Elevations do not vary significantly across the Site lands. Slope in the general area of the Site is northwest to southeast.
- The Site area is shown to be agricultural and developed with an orchard.
- The slope of the property is estimated between approximately zero to one percent in a southeasterly direction. The nearest natural surface water feature, Stanislaus River, is located ½ mile south of the Site. Sewage treatment ponds are located 1/4th mile to the south.

A copy of the Site topography can be found in the EDR report in Appendix B and historical topographic maps in Appendix C.

National Wetlands Inventory Map

National Wetlands Inventory (NWI) Maps, published by the U.S. Fish and Wildlife Service, indicate multiple Wetland areas south and southeast of the Site (See National Wetlands Inventory Map in Appendix B).

- Seven wetland areas 1/4th to 1/2 mile south of the Site as a result of sewage disposal ponds identified as PUBKx (palustrine, unconsolidated bottom, artificially flooded, excavated).
- Three wetland areas 1/2 mile south of the Site as a result of industrial waste ponds identified as PUBKx (palustrine, unconsolidated bottom, artificially flooded, excavated).
- Natural wetlands located predominately along the north shore of the Stanislaus River.

Flood Plain Map

Review of the Flood Plain Map, published by the Federal Emergency Management Agency (FEMA) and updated 1999, indicate the following:

- The Site is located 1/2 mile north and outside of the 100-year flood Plain which follows the Stanislaus River Valley. Lands subject to flooding include elevations up to approximately 50 feet Mean Sea Level. The 100-year flood and 500-year flood plain is shown on the EDR Overview Map in Appendix B.

3.2 Soils/Geology

Review of available Soil Conservation Service STATSGO information in the EDR report indicated the following:

- The soil component name is Veritas.
- The soil is established (54 inches) in the area as a fine sandy loam, moderate infiltration rate (Class B), and is moderately well drained soils with moderately coarse textures.
- Subordinate surface soil types and textures may include loamy sand, sandy loam, and coarse sandy loam.

Review of the Geologic Map of California published by the U.S. Geological Survey and the California Department of Mines and Geology, dated 1966, and the EDR Geocheck report of the USGS Digital Data Series – 11 (1994) indicated the following:

- The Site is located in the Central Valley physiographic province of California, which consists of Cenozoic stratified deposits.
- Quaternary (Q) stratified deposits are mapped in the area of the Site.
- No fault lines or earthquake epicenters of Richter 5 or greater are shown in the immediate vicinity of the Site.

3.3 Ground Water Hydrology

The GeoCheck database included in the EDR database contains the Site ID, groundwater flow direction, and shallow/deep/average water depth if reported. Review of the EDR AQUIFLOW Information System indicates the following:

- No Site-specific hydrogeological data was available for the Site.
- The Site is located within a shallow ground water basin formation with the estimated ground water level >25 feet below ground surface.
- Shallow ground water flow is expected to follow the ground level slope of surface elevations towards the south to southeast.
- Estimated ground water levels and flow directions may vary due to seasonal fluctuations in precipitation, local usage demands, geology, underground structures, dewatering or water well pumping operations.

3.4 Regulatory Records

The following federal, state and regional database sources were searched (Appendix B - EDR., dated October 28, 2002):

Federal ASTM Records

- Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS)

- Emergency Response Notification System (ERNS)
- National Priorities List (NPL)
- Resource Conservation and Recovery Information (RCRIS) for hazardous wastes
- Corrective Action Report (CORRACTS)
- Biennial Reporting System (BRS)
- Superfund Consent Decrees (CONSENT)
- Facility Index System (FINDS)
- Hazardous Materials Information Reporting System (HMIRS)
- Material Licensing Tracking System (MLTS)
- Federal Superfund Liens (NPL Liens)
- PCB Activity Database System (PADS)
- RCRA Administrative Action Tracking System (RAATS)
- Records of Decision (ROD)
- Toxic Chemical Release Inventory System (TRIS)
- Toxic Substances Control Act (TSCA)

State of California ASTM Records

- Bond Expenditure Plan (BEP)
- Annual Workplan (CAL-SITES AWP)
- CalSites (CALSITES ASPIS)
- California Hazardous Materials Incident Report System (CHMIRS)
- Cortese (CORTESE)
- Leaking Underground Storage Tank Information System (LUST)
- Proposition 65 (NOTIFY 65)
- Solid Waste Information System (SWIS)
- Toxic Pits (TOXIC PITS)
- Hazardous Substance Storage Container Database (CA UST)
- Facility Inventory Database (FID)
- Waste Management Unit Database (WMUDS/SWAT)

State of California Non-ASTM Records

- Aboveground Petroleum Storage Tank Facilities (AST)
- Hazmat Facilities (HAZMAT)
- Hazardous Waste Information System (HAZNET)
- South Bay Site Management System (SOUTH BAY)

- Waste Discharge System (WDS)

San Joaquin County

- San Joaquin County Environmental Health Department

RWQCB LUST and SLIC Records

- Leaking Underground Storage Tank Database (LUST REG 5)

A review of the information obtained from EDR found that the Site is not on the regulatory agency databases searched by EDR. Seven sites were identified on the database and field-identified in close proximity to the Site: Two of the sites were listed on the Federal ASTM Standard and Supplemental list. Five of the sites were listed on the State ASTM Standard and Supplemental list. Sites located beyond 1/4th mile are not considered to pose an environmental impact to the Site.

3.5 Federal ASTM Standard and Supplemental

The following sites are listed on the Federal ASTM standard and are located within 1/8th mile of the Site and at an equal or higher elevation:

<u>Site</u>	<u>Distance</u>	<u>Direction</u>
Simpson Paper Company COGEN Plant 944 S. Stockton Avenue, Ripon, CA	<1/8	E

Listed as a Small Quantity Generator and FINDS. Generator of off-specification, aged, or surplus organics. No violations found.

Fox River Paper Co. Ripon Mill 942 S. Stockton Avenue, Ripon, CA	<1/8	E
---------------------------------------------------------------------	------	---

Listed as a small quantity generator of off-specification, aged, or surplus organics; hydrocarbon solvents (benzene, hexane, Stoddard, etc.); liquids with halogenated organic compounds >1000 mg/L. No violations found.

3.6 State ASTM Standard and Supplemental

The following sites are listed on the State ASTM standard and are located within

1/8 mile of the Site and at an equal or higher elevation:

<u>Site</u>	<u>Distance</u>	<u>Direction</u>
Fox River Paper Mill Co Ripon Mill 942 S. Stockton Ave., Ripon, CA	1/4	E

Listed as Cal-Site, HIST UST and HAZNET Site. Generator of off-specification, aged, or surplus organics; hydrocarbon solvents (benzene, hexane, Stoddard, etc.); liquids with halogenated organic compounds >1000 mg/L. No violations found.

Simpson Paper Co. COGEN Plant 942 S. Stockton Ave., Ripon, CA	1/4	E
------------------------------------------------------------------	-----	---

Listed as HAZNET for disposal of off-specification, aged or surplus organics. No violations found.

Ripon Cogeneration Inc. 944 S. Stockton Ave., Ripon, CA	1/8-1/4	S
------------------------------------------------------------	---------	---

Listed as HAZNET for disposal of off-specification, aged or surplus organics, waste oil, and mixed oil. No violations found.

DeBoer Truck Lines Inc. 201 W. 5 th Street, Ripon, CA	1/8-1/4	N
---------------------------------------------------------------------	---------	---

Listed as HIST UST Site for a 6,000-gallon and 8,000-gallon diesel tank. Also listed as Cortese and LUST Site. Diesel soils only case closed. No violations found. This site is now operated as ATL.

Ripon Manufacturing Co. Inc (RMC) 652 S. Stockton Ave., Ripon, CA	1/8-1/4	NE
----------------------------------------------------------------------	---------	----

Listed as HAZNET for disposal of aqueous solutions with 10% or more total organic residues. No violations found.

4.0 COUNTY GOVERNMENT RECORDS REVIEW

Denali representative Toni Felarca contacted local agencies regarding records for the Site Address. This review indicated the following environmentally significant information:

File information was not ascertainable for the Site address at the following agencies, and relevant information for off-site properties was obtained where available (see Appendix D):

- San Joaquin County Department of Environmental Health
- Central Valley Regional Water Quality Control Board
- City of Ripon Building Department
- City of Ripon Fire Department
- San Joaquin County Agricultural Commissioner

Ripon Fire Department

According to Fire Marshall Dennis Bitters, the Ripon Fire Department conducted a training burn in the field area between the Nulaid Foods Inc. facility and the City of Ripon Sewage Disposal Ponds in mid-summer 2002. The fire burned off weeds on approximately 2 acres and was extinguished shortly afterward.

County Agricultural Commission

Department of Agriculture Pest Control Advisor, Mr. Robert Peltier, reviewed pesticide usage at the Site vicinity. Records of owner usage are kept only for a period of five previous years. Early orchards (40 to 60 years ago) in the area may have used DDT as a form of pest control, however, historical records of DDT use were not normally kept.

Hazel Gallego of the San Joaquin County Agricultural Commissioner performed a search of pesticide application documents that may have been filed for the Site in the previous five years under the owner Lombarty Holding Inc. and found none on record.

Typical pesticide materials used in the county are listed below:

Paraquat
Roundup (Glyphosate)
Copper-based fungicide
Methylbromide (Bromomethane)
Buctrill (Bromoxynil)
DDT (Prior to kept records)

5.0 AERIAL PHOTOGRAPHY

Denali reviewed available aerial photographs for the years 1957 to 1994 provided by the EDR-Aerial Photography Print Service (see Appendix C):

Cartwright 1957 B/W Scale 1'=666'

Agricultural land is observed with complete coverage by an orchard. Site is surrounded by agricultural land. No building structures onsite. The east and south border is an irrigation ditch/canal. Residential homes, commercial and industrial developments are visible to the north and northeast of the Site.

Western State Aerial 1982 I/R Scale 1"=690'

Infrared aerial photo showing Site orchard, disposal ponds and residential area or Ripon. Land south of Site has had orchard removed. Site shows no unusual color contrasts.

USGS 1994 B/W Scale 1'=666'

Site lands are removed of trees. The ground appears uniform with no unusual signs of earthwork. Industrial buildings (Nulaid Foods) are present on the northern side of the Site. City of Ripon sewage disposal ponds and Simpson Paper/Fox River Mill tree farm and industrial waste ponds are observed.

6.0 PRIOR-USE

6.1 Owner Interview

The current owner is identified as Lombardy Holding Inc., a California Corporation. The Site representative/property agent is Dan Prince. According to Dan, the Site consists of 2.83 acres of undeveloped land that is zoned industrial. The only recent activity was the cultivation of beans believed to have been by Merlin Mohler about two years ago. The Site has not been cultivated since. No

flooding or spills are known to have occurred on the Site. The South San Joaquin Irrigation District operates the adjacent north-south irrigation piping. Sanitary sewage lines are believed to run under or adjacent to the gravel road.

No utilities are presently onsite, however, Doak Boulevard will bring in utilities to service the area. Acacia Avenue will be connected to Doak.

6.2 Previous Investigations/Assessments

No previous site investigations or assessments were made available, or are known to Denali.

6.3 Plans and Specifications

A preliminary site location map was prepared by MID for the purpose of locating the layout of the proposed facility (See MID Drawing 1 in Figures).

7.0 SITE RECONNAISSANCE

7.1 Site and Vicinity Reconnaissance

Site Reconnaissance

The Denali California Registered Environmental Assessor, Mr. David Blunt, visited the Site on November 5, 2002 and was unaccompanied. The weather was clear and the temperature was mild at the time of the visit. Figure 2 shows Site features. Photographs of the Site are presented in Appendix E.

At the time of the Site visit, S. Stockton Avenue was blocked due to asphalt paving, and the Site was accessed from S. Locust Avenue. Nulaid Foods, Inc. warehouse borders the Site on the north (see Photograph 1). At the northwest corner of the Site, the land is unimproved at the end of S. Locust Avenue (see Photograph 2). At the northeast corner of the Site, a gravel road provides access along the eastern side of the Site to the eastern side of the Ripon Sewage Disposal Plant (see Photograph 3). The Simpson Paper/Fox River Mill Paper Co. borders the southeast corner of the Site on the east and the Ripon Sewage Disposal Plant on the South (see Photograph 4). The Ripon radio tower is located to the southwest of the Site (see Photograph 5). An open field is located on the west side of the Site (see Photograph 6). The ground was bare of

vegetation in areas with black ash suggesting a recent fire. Ground squirrel holes were apparent in the bare soil (see Photograph 7).

No pits, ponds, lagoons or depressions that could represent areas of potential waste burial were observed onsite. There was no evidence of storage or release of hazardous wastes. No buildings (farmhouses and outbuildings) were observed at the Site. There was no evidence of water wells onsite or septic systems that could have leachfields. This information is presented on Table 1.

Table 1. Additional Site Features

Site Features		Comments
Underground Utilities	<input type="checkbox"/> Natural Gas <input type="checkbox"/> Electrical <input type="checkbox"/> Fuel Oil	None observed.
Potable Water Supply	<input checked="" type="checkbox"/> Municipal <input type="checkbox"/> On-Site Well	None observed.
Sewage Disposal System	<input checked="" type="checkbox"/> POTW <input type="checkbox"/> On-Site Septic	None observed. Site is adjacent to the Ripon Sewage Disposal Plant.
High Power Trans-Mission Lines	<input checked="" type="checkbox"/> Present <input type="checkbox"/> Not Present	Pole mounted high-voltage lines located on east side of gravel access road.
Transformers	<input checked="" type="checkbox"/> Present <input type="checkbox"/> Not Present	Pole-mounted transformers located on power/telephone poles S. Stockton Avenue.

Vicinity Reconnaissance

Denali performed a site vicinity reconnaissance of the area on November 5, 2002.

Man hole covers, and a Proposition 65 sign were observed on the northeast corner of the Site (see Photograph 8). The signage and underground utilities are related to operations of the sewage disposal plant. An underground irrigation water line with a standpipe is located along the eastside of the gravel access road (see Photograph 9). The South San Joaquin Co. Irrigation District operates this underground line/lateral. Electric power line poles are located along the fenceline to the Simpson Paper/Fox River Mill Site (see Photograph 10).

The location of the Nulaid Foods Inc. plant refrigeration process system is on the south side of the plant/Warehouse. Aboveground tanks and a drum storage area are located directly north of the Doak Site (see Photograph 11). The site is listed as the administrative office, no waste operations are described except at the address of 337 E 4th Street.

Construction of Doak Boulevard will provide an east-west transit corridor along the south side of Ripon (see Photograph 12). Underground utilities will be a part of the roadway construction that will benefit the area.

Offsite operations in the vicinity of the Doak Site include the Ripon Transmission Tower, which is located approximately 1/4th mile southwest of the Site (see Photograph 12). At the base of the tower are two buildings that are used as the City of Ripon Kennel.

Untreated sewage is conveyed in underground pipes located along the gravel access road on the east side of the Doak Site to sewage ponds (see Photograph 13). Sewage is processed at the sewage facility in aeration ponds. With the exception of the potential for a biological upset and resultant nuisance odor, the sewage disposal plant, located downhill from the Doak Site poses little environmental impact to the Doak Site.

Monitoring wells are installed along the property line of the Fox River Paper Co. to test groundwater quality (see Photograph 14). The Fox River Mill is located approximately 0.5 miles east of the Site (see Photograph 15). Monitoring results are presented in Appendix D.

The DeBoer Truck Line site is listed as a former Leaking Underground Storage Tank (LUST) site for a soils only case (see Photograph 16). Alterman Truck Lines now operate the site. The case has been closed (see Section 3.6 and Appendix D). This site poses no environmental impact to the Site.

Table 2. Adjacent Properties

Land Use	Business Name And Address	Direction From Site
Industrial	Nulaid Foods Inc.	North
Industrial	Fox River Paper Co. and Paper Mill	East
Industrial	Ripon Sewage Disposal Plant/COGEN Plant	South
Industrial/ Agricultural	City of Ripon Agricultural land	West
Industrial	Ripon Radio Transmission Tower And City Kennel.	Southwest

7.1.1 Hazardous Materials/Petroleum Products Storage and Handling

Visual observation for the use and/or storage of hazardous materials and petroleum products was performed. No storage or hazardous materials handling was observed at the Site.

7.1.2 Waste Generation, Treatment, Storage, and Disposal

Visual observation for the generation, treatment, storage, and disposal of wastes was performed. The Site does not generate waste.

7.1.3 Polychlorinated Biphenyls (PCBs)

Pole-mounted transformers were observed along S. Stockton Avenue. There were no indications that the transformers contained PCBs.

7.1.4 Asbestos-Containing Materials (ACM)

As-built plans, drawings, and specifications were not available for review. New construction standards do not include/recommend ACM materials.

7.1.5 Radon Gas

The U.S. EPA and the U.S. Geologic Survey have evaluated the radon potential in the U.S. and have developed a map to assist national, state, and local organizations to target their resources and to assist building code officials in deciding whether radon-resistant features are applicable in new construction. The radon designation ranges from Zone 1- Highest Potential (greater than 4 pCi/L) to Zone 3- Low Potential (less than 2 pCi/L).

The Site is located in Zone 3- Indoor Average Level (<2 pCi/L).

7.1.6 Lead-Based Paint

Lead-base paint was not addressed due to the non-residential nature of the Site.

7.1.7 Lead in Water

Well locations are shown on the EDR Physical Setting Source Map page A-7. Dissolved lead was not reported in the analytical testing performed on local wells.

However, chemical constituents reported include industrial solvents, which are reported below:

California well #2630 also identified as the Renfroe Well is located 1/8th to 1/4th mile northeast of the Site. Well #2630 was reported in 1986 to contain trichloroethylene at concentrations of 9 to 10 ug/L and cis-1,2-dichloroethylene at concentrations of 30 to 50 ug/L.

Test results for California well #4452 also identified as Houston School system well #01 is located 1/8th to 1/4th mile west-northwest. Well #4452 was reported in 1986 to contain dibromochloropropane (DBCP) at concentrations of 0.11 and 0.27 ug/L. This well was abandoned.

Test results for California well #2627 also identified as Houston school system well #06 located 1/4th to 1/2 mile east northeast. Well #2627 was reported in 1986 to contain trichloroethylene at a concentration of 150 ug/L. The well has been inactivated.

7.1.8 Facility Storage Tanks and Pipelines (above or below ground)

Visual observations for manways, vent pipes, fill connections, concrete pads, and saw cuts in paved areas did not identify and surface connections or disturbances with would indicate that the potential for an underground storage tank (UST) installation exists.

No aboveground storage tanks (ASTs) were observed. The review of the state list of registered USTs indicated that no tanks are registered for the Site.

7.1.9 Surface Areas

General surface features of the Site consist of a flat parcel of land graded and tilled to provide some slope and swale to direct surface water to collection ditches. Surface flow is in a southerly direction. Visual observation of the Site and adjacent properties did not identify any evidence of distressed vegetation, staining, or surface migration of petroleum releases or hazardous materials onto or off of the Site.

No visible evidence of on-site surface impoundment facilities, pits, dry wells, or dumping of apparent hazardous substances was observed at the Site. The irrigation canal was the only surface water feature observed at the Site.

Storm water from vegetated surface areas is directed to the south and east via overland flow and drainage ditches.

8.0 CONCLUSIONS

Environmental conditions and the actual potential for contamination of the Site by hazardous substances and/or hazardous materials were evaluated by performing the tasks outlined in Section 1.0. Denali did not observe evidence of recognized existing environmental issues at the Site as a result of past or present land use practices. Denali did not observe indicators of the use, generation and storage of hazardous substances at the Site. Denali did not observe evidence of release of hazardous substances at the Site. The results of the assessment of the on-site and off-site actual and/or potential contamination are summarized below.

8.1 On-Site Summary

Denali did not observe existing environmental issues at the Site as result of past/present land use practices. None of the available records reviewed by Denali document or suggest that a release of a hazardous substance or hazardous materials has occurred at the Site. Usage of the pesticide DDT with orchard crops has historically occurred in the County.

8.2 Off-Site Summary

The Phase I Environmental Site Assessment did not reveal evidence of recognized environmental conditions in-connection with the Off-Site properties. Based on information developed during this assessment, the off-site locations reviewed by Denali have been remedied and granted case closure or are too distant and not believed to pose an environmental threat to the Site.

9.0 RECOMMENDATIONS

Based on the findings and conclusions of this Environmental Site Assessment, the following recommendations are provided to address the areas of concern discussed above:

- A representative soil sample should be collected from the Site and tested for potential persistent pesticides such as DDT that may impact the District's possible future use of the property.

10.0 LIMITATIONS

The services described in this report were performed consistent with generally accepted consulting principles and practices. No other warranty, expressed or implied, is made. These services were performed consistent with our agreement with the Client. This report is solely for the use of the Client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the Client, purposes, locations, time frames, and project parameter indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to the performance of services. We do not warrant the accuracy of information supplied by others.

The purpose of an environmental assessment is to reasonably evaluate the potential for or actual impact of past and current practices on the Subject Property. In performing an environmental assessment, it is understood that a balance must be struck between a reasonable inquiry into the environmental issues and an exhaustive analysis of each conceivable issue of potential concern. The following paragraph discusses the assumptions and parameters under which such an opinion is rendered.

No investigation is thorough enough to exclude the presence of hazardous substance or materials at a given site. If hazardous conditions have not been identified during the assessment, such a finding should not, therefore, be construed as a guarantee of the absence of such materials on the site, but rather as the services performed within the scope, limitation, and cost of the work performed. Environmental conditions may exist on the Subject Property that cannot be identified by visual observation.

11.0 REFERENCES

EDR Radius Map with GeoCheck, Inquiry No: 0871553.4r, October 28, 2002, Environmental Data Resources, Inc. Southport, Connecticut.

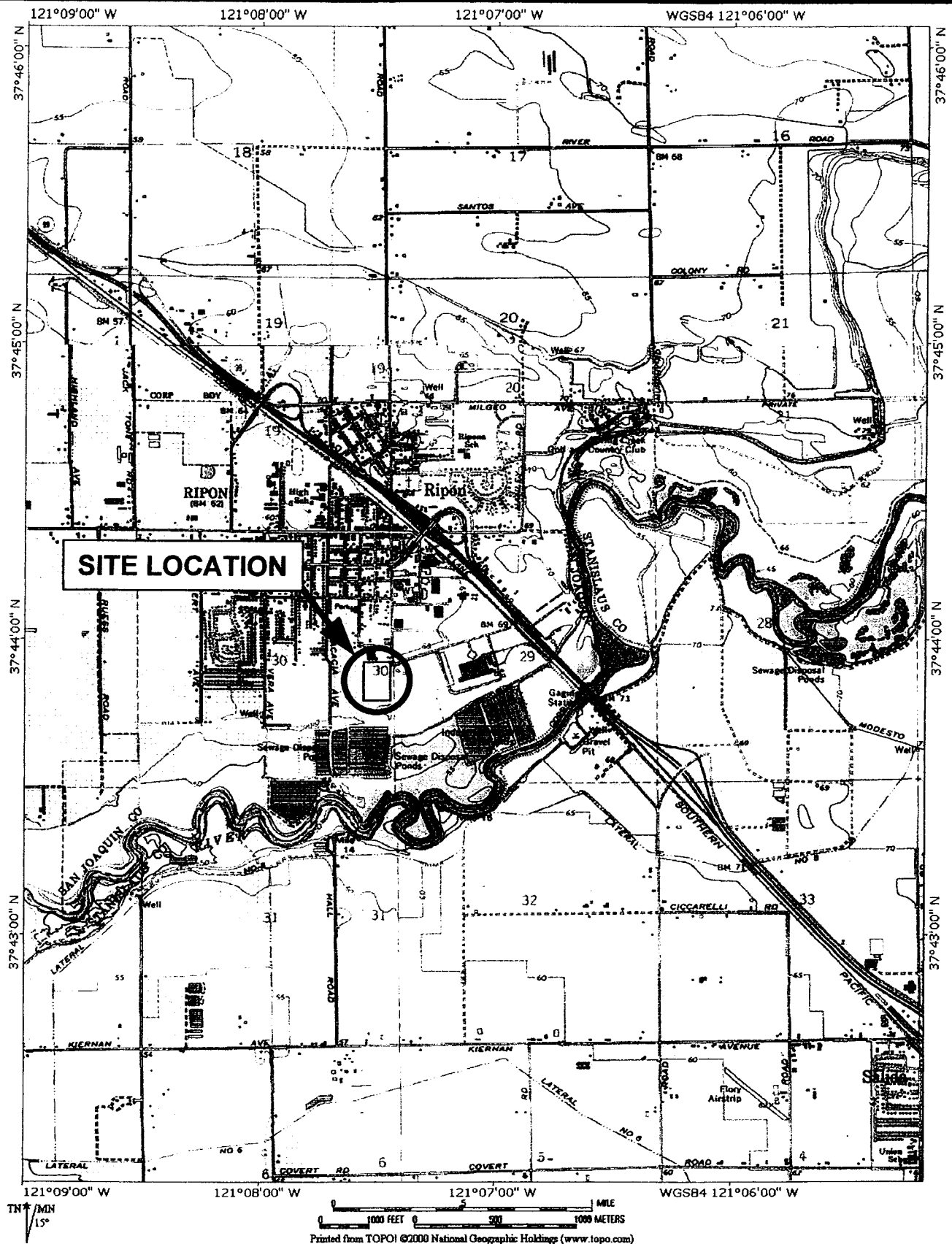
EDR –Historical Topographic Map Report, Inquiry No: 0871553-6, October 31, 2002, Environmental Data Resources, Inc. Southport, Connecticut.

EDR Aerial Photography Print Service, Inquiry No: 0871553-7, October 31, 2002,
Environmental Data Resources, Inc. Southport, Connecticut.

U.S. Geological Survey (USGS), 1969, Topographic Map for Salida, San Joaquin
County, California, 7.5 Minute Series, Photorevised 1976.

APPENDICES

FIGURES



The Denali Group

LOCATION MAP

MID Doak Site
S. Stockton Ave. and Doak Blvd.
Ripon, California

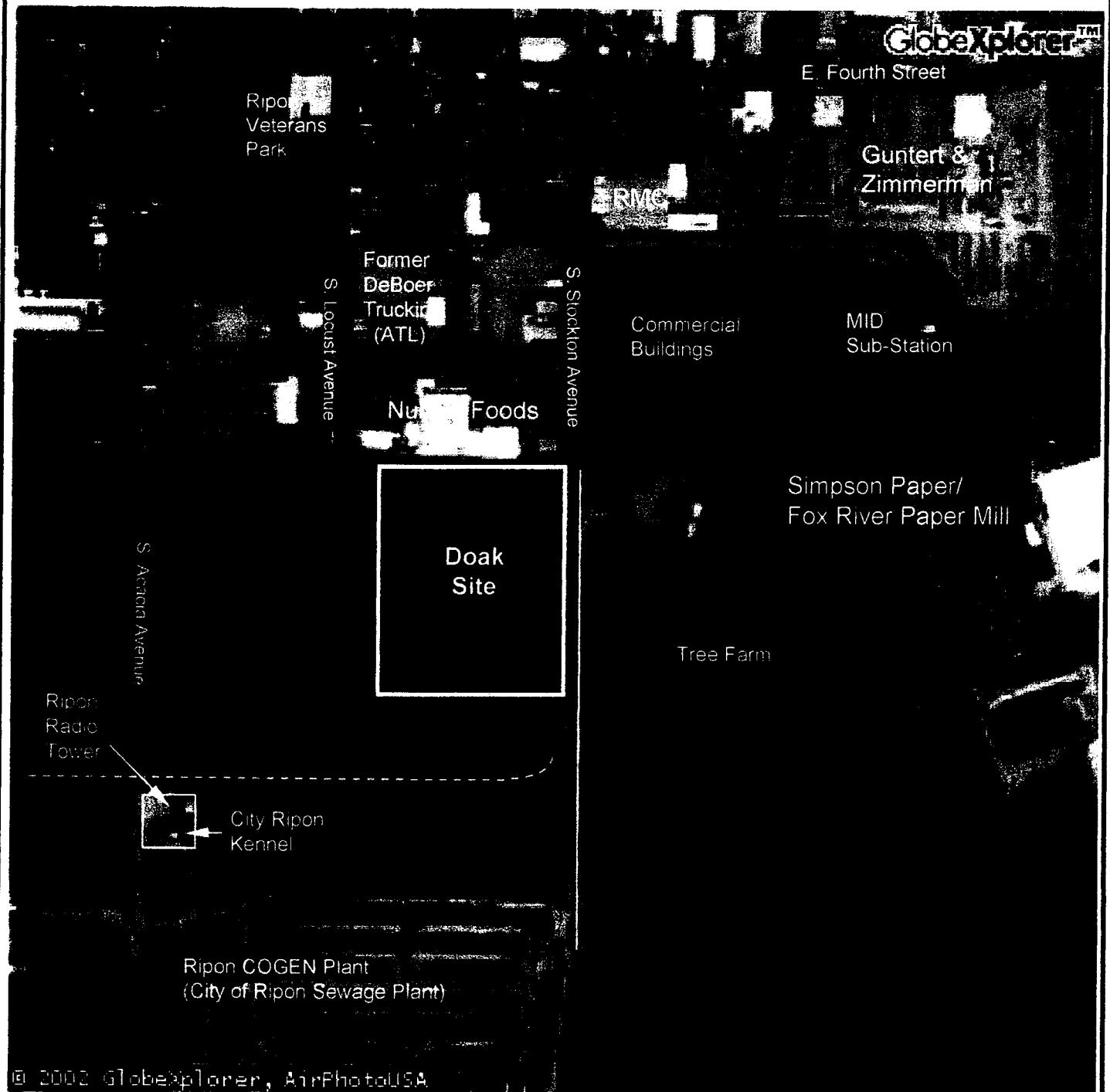
Drawn:

Date: 10/29/02

Reviewed:

Revised:

Figure 1



Basemap: Mapquest/Globexplorer, Eastman Kodak Company, 2002.

The Denali Group

SITE OVERVIEW MAP

MID Doak Site
E. Stockton Avenue
Ripon, California

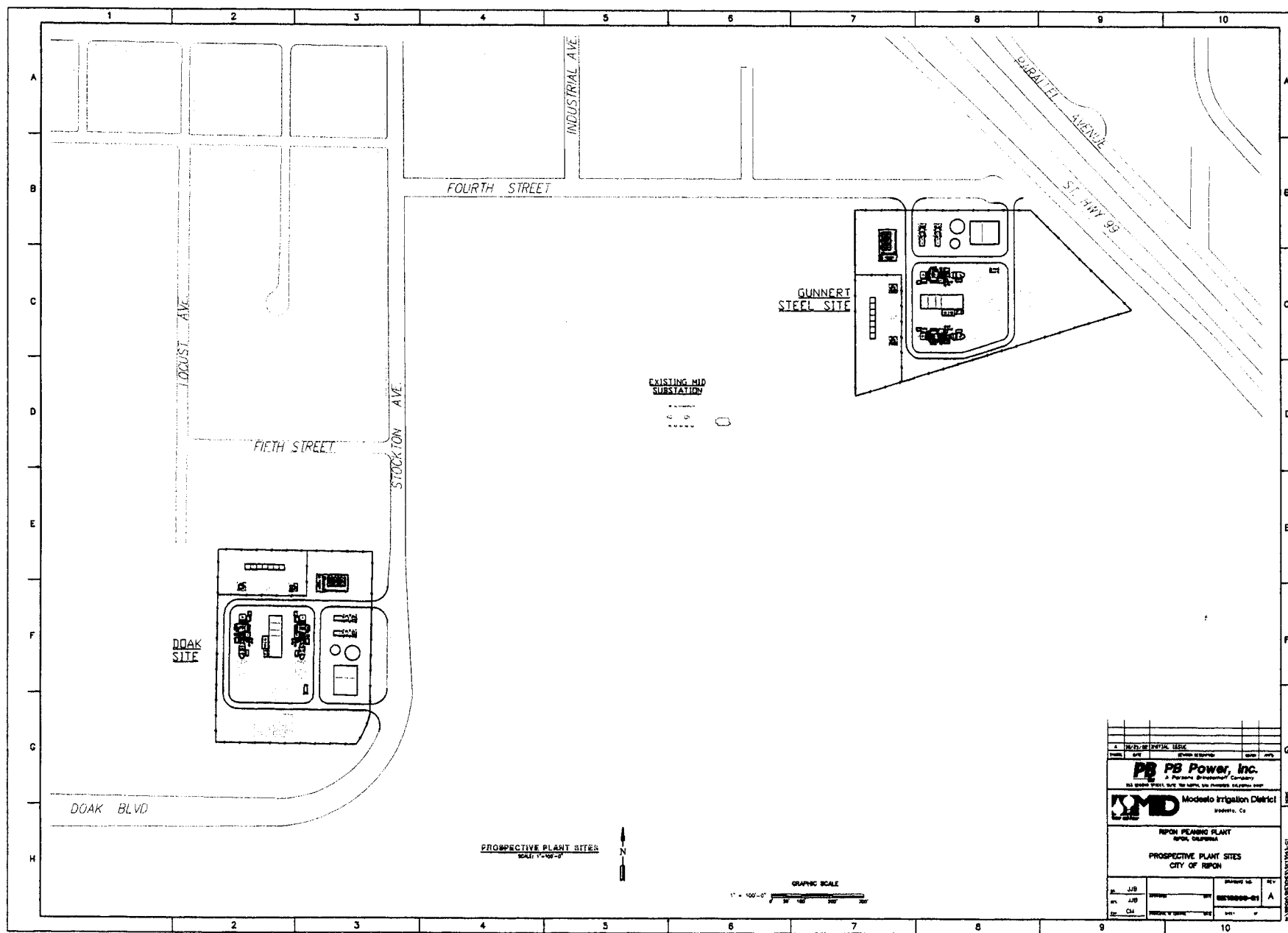
Drawn:

Date: 10/28/02

Reviewed:

Revised:

Figure 2



A. 10-21-18 INITIAL ISSUE		DATE	BY
DESIGN	DATE	DESIGN REVISION	DATE
PB PB Power, Inc. a Peabody Energy Company ALL RIGHTS RESERVED. THIS DOCUMENT IS THE PROPERTY OF PB POWER, INC.			
MID Modesto Irrigation District Modesto, Ca			
RIPON PEAMING PLANT Ripon, California PROSPECTIVE PLANT SITES CITY OF RIPON			
BY: JJB	DATE: 10/21/18	PROJECT NO: 18010000-01	REV: A
BY: JJB	DATE: 10/21/18	PROJECT NO: 18010000-01	REV: A
BY: CM	DATE: 10/21/18	PROJECT NO: 18010000-01	REV: A

IN WITNESS WHEREOF, I have hereunto set my hand and the seal of the City of Ripon, California, this 21st day of October, 2018.